

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANK QUAGLIA,

Plaintiff,

-against-

BRAVO NETWORKS, NATIONAL
BROADCASTING COMPANY, INC., doing
business as NBC; RAINBOW
PROGRAMMING HOLDINGS, INC., and
DOES 1-10,

Defendants.

Civil Action No. 04-10460 RWZ

**DECLARATION OF LAURA M. VASEY
IN SUPPORT OF DEFENDANT
RAINBOW MEDIA HOLDINGS LLC'S
RESPONSE TO PLAINTIFF'S MOTION
TO COMPEL**

LAURA M. VASEY hereby declares, pursuant to 28 U.S.C. § 1746(2), the following:

1. I am an attorney at Loeb & Loeb LLP, attorneys for Defendant Rainbow Media Holdings LLC, sued herein as Rainbow Programming Holdings, Inc. ("Rainbow"), in this matter. I respectfully submit this Declaration in support of Rainbow's Response to Plaintiff's Motion to Compel.

2. Attached hereto as Exhibit 1 is a true and correct copy of Rainbow's Responses and Objections to Plaintiff's First Request and First Supplemental Request for Production of Documents.

3. Attached hereto as Exhibit 2 is a true and correct copy of Rainbow's Objections and Responses to Plaintiff's First Set of Interrogatories.

4. Attached hereto as Exhibit 3 is a true and correct copy of my letter dated September 30, 2004, to Plaintiff's former counsel, Neville L. Johnson, Esq., advising that the Beta tapes containing auditions from the first season of *The It Factor* were available for his inspection.

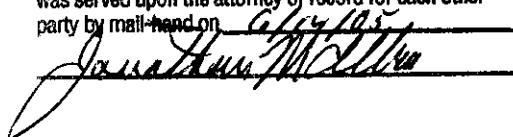
I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 13, 2005


Laura M. Vasey

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by mail-hand on 6/14/05



SERVICE LIST

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